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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Consolidated Case No. 3:20-cv-08570-JD

**DECLARATION OF AMANDA F.
LAWRENCE IN SUPPORT OF
ADVERTISER PLAINTIFFS' MOTION
TO EXCLUDE OPINIONS OF DR.
HOCHBERG**

Hearing Date: December 14, 2023
Hearing Time: 10:00 a.m.
Courtroom: 11, 19th Floor
Judge: The Honorable James Donato

1 I, Amanda F. Lawrence, declare as follows:

2 1. I am an attorney admitted pro hac vice in this action (the “Action”). I am a partner at
3 Scott+Scott Attorneys at Law LLP, interim Co-Lead Counsel for the Advertiser Classes in the Action.
4 I submit this declaration in support of Advertiser Plaintiffs’ Motion to Exclude the Opinions of Dr.
5 Yael Hochberg, an expert witness retained by Meta Platforms, Inc. (“Meta”). The contents of this
6 declaration are based on my personal knowledge, including my personal knowledge of the documents
7 cited herein. The facts set forth herein are within my personal knowledge and if called as a witness,
8 I could and would competently testify to them.

9 2. Attached hereto as **Exhibit 1** is a true and correct copy of Meta’s Expert Report of
10 Yael Hochberg, Ph.D. Errata, dated August 25, 2023 and marked Plaintiffs’ Deposition Exhibit 2509.

11 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the transcript
12 of the September 19, 2023 deposition of Yael Hochberg.

13 4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from *The Sedona*
14 *Conference on the Role of Economics in Antitrust Law*, 7 SEDONA CONF. J. 69 (2006)

15 5. Attached hereto as **Exhibit 4** is a true and correct copy of Richard Schmalensee,
16 *Standards for Dominant Firm Conduct: What Can Economics Contribute?*, THE ECONOMICS OF
17 MARKET DOMINANCE (1985).

18 6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from Dennis W.
19 Carlton & Jeffrey M. Perloff, *Modern Industrial Organization* (4th ed. 2005).

20 7. Attached hereto as **Exhibit 6** is a true and correct copy of Franklin M. Fisher,
21 *Economic Analysis and ‘Bright-Line’ Tests*, 4 J. OF COMPETITION L. AND ECONS. 1 (2007), a document
22 produced by Meta in this litigation.

23 8. Attached hereto as **Exhibit 7** is a true and correct copy of Advertiser Plaintiffs’ Expert
24 Report of Michael A. Williams, Ph.D., dated July 7, 2023 and marked Plaintiffs’ Deposition Exhibit
25 2510.

26 9. Attached hereto as **Exhibit 8** is a true and correct copy of Advertiser Plaintiffs’ Expert
27 Reply Report of Kevin Kreitzman, dated September 15, 2023 and marked Plaintiffs’ Deposition
28

1 Exhibit 2513.

2 10. Attached hereto as **Exhibit 9** is a true and correct copy of Advertiser Plaintiffs' Expert
3 Reply Report of Michael A. Williams, Ph.D., dated September 15, 2023.

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct. Executed on this 6th day of October, 2023 at Colchester, Connecticut.

6
7 /s/Amanda F. Lawrence

Amanda F. Lawrence

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9
10 **CERTIFICATE OF SERVICE**

11 I hereby certify that on October 6, 2023, I caused a true and correct copy of the foregoing
12 document to be served by electronic mail on all counsel of record.

13 Dated: October 6, 2023

By: /s/Amanda F. Lawrence

Amanda F. Lawrence